

# **EXHIBIT 6**

**Redacted Version of  
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to be Sealed**

**From:** Tracy Gao  
**Sent:** Monday, January 23, 2023 7:43 PM  
**To:** Ryan McGee x3030; Viola Trebicka; QE Brown; Google Team  
**Subject:** RE: Brown v Google LLC, No 4:20-cv-03664-YGR-SVK; Preservation Meet & Confer

Ryan,

Below please find answers to your questions regarding the [REDACTED] tables:

1. Specific to the [REDACTED] data sources:

- Their names (including any nicknames or codenames)

Google's response: We are not aware of any official or unofficial names of the [REDACTED] tables. They are sometimes referred to by the directories in which they are stored, as follows:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

- The identifiers (for example, but not limited to: biscotti, [REDACTED] IDFA, ADID, GAIA, Android ID, Zwieback) are contained in these data sources

Google's response: These tables contain Biscotti IDs.

2. Specific to the Analytics data sources:

- The information stored in the [REDACTED] and [REDACTED] tables, and what data is different between them

Google's response: the [REDACTED] table stores information related to Google Analytics 4 and the [REDACTED] table stores information related to Universal Analytics.

We have also reviewed your other questions, and they do not appear to be at all within the scope of the Court's January 17 Order. For example, you ask for information on "how much data is added and deleted each day," but that does not help in any way to further the substance of the meet and confer, which is for the purpose of "Google demonstrating to Plaintiffs how the information in the tables that are the subject of the Motion is contained in or may be derived from other information that Google is preserving in this case." Dkt. 830 at 2; *see also* 1/10/23 Hrg. Tr. 23:9-10 ("I'm not going to, again, reorder or reopen discovery and have a full review of everything in these tables."); *id.* 25:24-25 ("it will [] be fairly simplified and direct inquiry or demonstration."). If you believe that any of the questions we have not responded to is relevant and helpful, please identify why so that we may consider.

We have emailed you separately regarding our availabilities for the meet and confer.

Best,  
Tracy

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**From:** Ryan McGee x3030 <rmcgee@forthepeople.com>  
**Sent:** Monday, January 23, 2023 12:49 PM  
**To:** Viola Trebicka <violatrebicka@quinnemanuel.com>; QE Brown <qebrown@quinnemanuel.com>; Google Team <GOOGLETEAM@lists.susmangodfrey.com>  
**Subject:** RE: Brown v Google LLC, No 4:20-cv-03664-YGR-SVK; Preservation Meet & Confer

[EXTERNAL EMAIL from [rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)]

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Thanks Viola.

It would be helpful to know going in that our requests below will be addressed and, if necessary, any clarification is needed because Google's engineers do not understand items on the list. That way the meet and confer will be more efficient and we can focus on the substance rather than continued back and forth with clarifying requests.

So that we can gather our availability, it would also be helpful to know what times Google is looking at (or not available) for the meet and confer.

Please let us know,  
Ryan

**Ryan McGee**

Attorney

[My Bio](#)

**P:** (813) 223-0931

**F:** (813) 222-4702

**A:** 201 N Franklin St, 7th Floor, Tampa, FL 33602



*A referral is the best compliment. If you know anyone that needs our help, please have them call our office 24/7.*

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**From:** Viola Trebicka <[violatrebicka@quinnemanuel.com](mailto:violatrebicka@quinnemanuel.com)>

**Sent:** Monday, January 23, 2023 12:30 PM

**To:** Ryan McGee x3030 <[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)>; QE Brown <[gebrown@quinnemanuel.com](mailto:gebrown@quinnemanuel.com)>; Google Team <[GOOGLETEAM@lists.susmangodfrey.com](mailto:GOOGLETEAM@lists.susmangodfrey.com)>

**Subject:** \*EXT\* RE: Brown v Google LLC, No 4:20-cv-03664-YGR-SVK; Preservation Meet & Confer

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Ryan,

The Court asked for *Brown* and *Calhoun* to coordinate the meet and confer on this topic. We will make ourselves available this week, and will coordinate a time that works for all plaintiffs' counsel and counsel for Google.  
Viola

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**From:** Ryan McGee x3030 <[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)>

**Sent:** Monday, January 23, 2023 7:34 AM

**To:** QE Brown <[gebrown@quinnemanuel.com](mailto:gebrown@quinnemanuel.com)>; Google Team <[GOOGLETEAM@lists.susmangodfrey.com](mailto:GOOGLETEAM@lists.susmangodfrey.com)>

**Subject:** RE: Brown v Google LLC, No 4:20-cv-03664-YGR-SVK; Preservation Meet & Confer

[EXTERNAL EMAIL from [rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)]

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Good morning,

Following up on this request. Can you please let us know availability for the meet and confer?

Thanks,  
Ryan

**Ryan McGee**  
Attorney  
[My Bio](#)

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**From:** Ryan McGee x3030 <[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)>

**Sent:** Thursday, January 19, 2023 11:53 PM

**To:** QE Brown <[gebrown@quinnemanuel.com](mailto:gebrown@quinnemanuel.com)>; Google Team <[GOOGLETEAM@lists.susmangodfrey.com](mailto:GOOGLETEAM@lists.susmangodfrey.com)>

**Subject:** Brown v Google LLC, No 4:20-cv-03664-YGR-SVK; Preservation Meet & Confer

Counsel,

Following the Court's January 10, 2023 hearing, Plaintiffs would like to meet and confer about the [REDACTED] data sources that Google seeks relief from preserving.

We have worked with our consultants to identify the following areas of inquiry and non-exhaustive questions for the court-ordered meet and confer with Google's engineers:

1. For all data sources:
  - The current total size of each data source
  - How much data is added and deleted each day
  - The upstream and downstream sources
  - The products, services, and algorithms that use these data sources
  - Their retention periods
  - The names of the root proto that defines the schema for these sources
  - How these data sources can be queried (types of identifiers and other data points)
  - The identifier(s) that each data source is keyed to
  - The structure of each data source (columns present, field names, other data contained)
  - Whether the data is exclusive to US-based users or worldwide
  - Whether the data is sampled and, if so, the sample rate
  - Whether the sources also contain application traffic and, if so, the proportion of that application traffic
  - Whether Google will provide a sample or daily snapshot of each data source
  - Google's investigation into data minimization strategies that would still preserve all of the data in these data sources
2. Specific to the [REDACTED] data sources:
  - Their names (including any nicknames or codenames)

- The identifiers (for example, but not limited to: biscotti, [REDACTED], IDFA, ADID, GAIA, Android ID, Zwieback) are contained in these data sources
3. Specific to the Analytics data sources:
- The information stored in the [REDACTED] and [REDACTED] tables, and what data is different between them

Please advise your availability.

Regards,  
Ryan

**Ryan McGee**  
Attorney  
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